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BY ECF

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Honorable Alison J. Nathan U.S. District Court for the Southern District of New York 40 Foley Square, Room 2102 New York, NY 10007

Re: Lauren Yu v. Froneri US, Inc., No. 1:20-cv-08512-AJN

Judge Nathan:

We write on behalf of defendant Froneri US, Inc.¹ to request an adjournment of the initial pretrial conference and related deadlines for pre-conference submissions.

The initial pretrial conference date is scheduled for March 12, 2021, with a proposed civil case management plan and joint letter due no later than March 5, 2021. On March 5, 2021, defendant intends to file a motion to dismiss the complaint. Defendant believes it is in the interest of judicial efficiency to resolve challenges to the pleadings prior to engaging in the initial pretrial conference and associated proposed civil case management plan and joint letter. Thus, defendant requests that the Court continue the conference until resolution of the motion to dismiss.

Plaintiff does not oppose this request.

cc: Counsel of record (by ECF)

This Court granted one previous request for adjournment of the initial pretrial conference date, from January 28, 2021 to March 12, 2021. The requested adjournment does not affect any other scheduled dates. Defendant submits this request more than 48 hours prior to the date by which the parties are required to submit the proposed civil case management plan and joint letter. If the Court wishes to set a new date for the initial pretrial conference at this time, the parties propose May 7, 2021, May 14, 2021, or May 21, 2021.

Sincerely,

/s/ Daniel D. Queen

The initial pre-trial conference is hereby adjourned *sine die*. SO ORDERED.

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3/2/2021

¹ Plaintiff sued Froneri US, Inc., but the entity that manufactures, markets, and sells Häagen-Dazs[®] Coffee Almond Crunch Ice Cream Bars is Dreyer's Grand Ice Cream, Inc.